

REMARKS

In the Office Action, the Examiner rejected claims 1-3 and 6-16 under 35 U.S.C. § 103(a) as unpatentable over Kumar et al. (U.S. Patent No. 6,006,253) in view of Pang et al. (U.S. Patent No. 6,298,045), and rejected claims 4, 5, and 17-19 under 35 U.S.C. § 103(a) as unpatentable over Kumar et al. in view of Skarbo et al. (U.S. Patent No. 5,546,447) and Pepper et al. (U.S. Patent No. 5,930,700).

Applicants respectfully traverse the Examiner's rejections. Claims 1-19 remain pending.

The Examiner rejected claims 1-3 and 6-16 under 35 U.S.C. § 103(a) as allegedly unpatentable over a combination of Kumar et al. and Pang et al. Applicants traverse the rejection.

Kumar et al. discloses an H.323 system that provides a back-channel for receiver terminals in a loosely-coupled conference (col. 2, lines 46-63; Fig. 1). Pang et al., on the other hand, discloses a platform by which voice and data communications may occur in multiple modes and various protocols (col. 2, lines 22-25).

By contrast, the present invention recited in independent claim 1, for example, includes a combination of features, including a gateway and a signal routing agent. The gateway communicates with a switched circuit network and translates switched circuit network-compatible signals into computer network-compatible signals. The signal routing agent communicates with the gateway and with one or more terminals. The signal routing agent receives plural incoming calls from the gateway addressed to a selected one of the terminals and simultaneously transmits plural line appearance signals that identify origins of the incoming calls to the selected terminal.

Neither Kumar et al., nor Pang et al., whether taken alone or in any reasonable combination, discloses or suggests this claimed combination of features. Among other things, neither of the references, alone or in combination, discloses or suggests a signal routing agent that receives plural incoming calls addressed to a selected one of the terminals and simultaneously transmits plural line appearance signals that identify the origins of the incoming calls to the selected terminal.

The Examiner admitted that Kumar et al. does not disclose these features (Office Action, page 2). The Examiner alleged, however, that Pang et al. discloses an office attendant-type communication program that sends calls to one or more computers which are described in a graphical user interface as various lines (Office Action, pages 2-3). The Examiner seemingly also alleged that Pang et al. discloses transmitting a plurality of incoming calls simultaneously. Applicants respectfully disagree.

At column 13, lines 47-55, Pang et al. discloses an office attendant type program that permits one or more computers to control the telephony and related functions of communications system 50, which Pang et al. discloses as a device that includes the functionality of a public branch exchange (PBX) (col. 6, lines 55-56). When a party desires to control incoming and outgoing calls and/or station-to-station calls of an office, the party may run the attendant type program from one or more computers connected to communications system 50 (col. 13, lines 59-63). Pang et al. does not disclose, however, a signal routing agent that receives plural incoming calls addressed to a selected one of the terminals, as recited in claim 1.

Moreover, Pang et al. does not disclose simultaneously transmitting plural line appearance signals that identify origins of the incoming calls to the selected terminal, as further

recited in claim 1. The Examiner alleged that Pang et al. shows multiple line appearance signals in Fig. 8A. Applicants disagree.

In Fig. 8A, Pang et al. shows a window 130 that includes one or more line displays 132 that indicate various telephone lines available in an application of communications system 50 (col. 16, lines 23-27). The line displays 132 correspond to telephone lines that are being monitored (col. 16, lines 33-36). The line displays 132 display the name, extension, and/or telephone number of one or both parties to a call (col. 16, lines 36-38). Therefore, the line displays 132 of Pang et al. correspond to different calls between different terminals. Pang et al. does not disclose that the line displays display plural line appearance signals intended for the same terminal.

Accordingly, neither Kumar et al. nor Pang et al., whether taken alone or in any reasonable combination, discloses or suggests a signal routing agent that receives plural incoming calls addressed to a selected terminal and simultaneously transmits plural line appearance signals that identify the origins of the incoming calls to the selected terminal. As such, the Examiner has failed to establish a *prima facie* case under 35 U.S.C. § 103. The rejection under 35 U.S.C. § 103(a) with regard to claim 1 is, therefore, improper and should be withdrawn.

In addition, the Examiner has not explained how and why one of ordinary skill in the art at the time of Applicants' invention would have been motivated to combine the various features of Kumar et al. and Pang et al. Indeed, Applicants believe that it would not be reasonable to combine features of a system that provides a back-channel for receiver terminals in a loosely-

coupled conference (Kumar et al.) with a platform that permits voice and data communications to occur in multiple modes and various protocols (Pang et al.).

The only apparent motivation for combining the references is found in Applicants' own disclosure which, of course, may not properly be relied upon to support the ultimate legal conclusion of obviousness under 35 U.S.C. § 103. Absent such impermissible hindsight reasoning, one of ordinary skill in the art, having the Kumar et al. reference, would not have been motivated to modify the reference in the manner suggested by the Examiner.

Further, neither of the references suggests the modification of references set forth by the Examiner. For example, Pang et al. provides no reason for combining the disclosed office attendant type program with the loosely-coupled conferencing system of Kumar et al. Therefore, the Examiner's combination of the references is improper.

Accordingly, Applicants respectfully submit that independent claim 1 is patentable over Kumar et al. and Pang et al., whether taken alone or in any reasonable combination. Claims 2, 3, and 6-8 depend from claim 1 and, therefore, are patentable over the cited references for at least the reasons given with regard to claim 1.

Independent claim 9 recites a combination of features, including a signal routing agent, a gateway, and at least one gatekeeper. The gateway receives an incoming call and translates the call into computer network-compatible signals. The gatekeeper communicates with the gateway and in response to receipt of the incoming call, controls the gateway to transmit the computer network-compatible signals to the signal routing agent. The signal routing agent, in response to receipt of the computer network-compatible signals, identifies corresponding ones of the

terminals assigned to receive the computer network-compatible signals and transmits line appearance messages that identify the origin of the incoming call to each of the terminals.

Neither Kumar et al. nor Pang et al., whether taken alone or in any reasonable combination, discloses or suggests this claimed combination of features. Among other things, neither of the references, alone or in combination, discloses or suggests a signal routing agent that receives computer network-compatible signals corresponding to an incoming call, identifies corresponding terminals assigned to receive the signals, and transmits line appearance messages that identify the origin of the incoming call to each of the terminals.

The Examiner asserted that Kumar et al. discloses a gatekeeper that provides control access over a network in such a way that the gatekeeper is connected with a gateway and a MCU (Office Action, page 3). The Examiner failed, however, to address the features described above. Kumar et al. fails to disclose or suggest these features. The disclosure of Pang et al. fails to cure these deficiencies in the disclosure of Kumar et al. Therefore, the Examiner has failed to establish a *prima facie* case under 35 U.S.C. § 103. The rejection under 35 U.S.C. § 103(a) with regard to claim 9 is, therefore, improper and should be withdrawn.

Accordingly, Applicants respectfully submit that independent claim 9 is patentable over Kumar et al. and Pang et al., whether taken alone or in any reasonable combination. Claims 10-14 depend from claim 9 and, therefore, are patentable over the cited references for at least the reasons given with regard to claim 9.

Independent claim 15 recites features similar to claims 1 and 9. For example, claim 15 recites "transmitting plural line appearance signals that identify origins of the incoming calls to each of the end-points." Kumar et al. and Pang et al. do not disclose or suggest this feature.

Claim 15 is, therefore, patentable over the cited references for reasons similar to those given with regard to claims 1 and 9. Claim 16 depends from claim 15 and, therefore, is patentable over the cited references for at least the reasons given with regard to claim 15.

The Examiner rejected claims 4, 5, and 17-19 under 35 U.S.C. § 103(a) as unpatentable over Kumar et al. and Skarbo et al. in view of Pepper et al. Applicants respectfully traverse the Examiner's rejection.

Applicants first note that the Examiner rejected claims 4, 5, and 17-19 over a combination of Kumar et al., Skarbo et al., and Pepper et al. In rejecting the claims, however, the Examiner did not rely on any portion of Skarbo et al. Therefore, clarification as to the basis of the rejection of claims 4, 5, and 17-19 is respectfully requested.

Applicants also note that claims 4 and 5 depend from claim 1, which was rejected based on a combination of Kumar et al. and Pang et al. The Examiner rejected claims 4 and 5 based on a combination that includes Skarbo et al. and Pepper et al., but does not include the Pang et al. reference. Therefore, the rejection of claims 4 and 5 is improper and should be withdrawn.

Nevertheless, with regard to dependent claims 4 and 5, Applicants submit that the disclosures of Skarbo et al. and Pepper et al. fail to cure the deficiencies in the disclosures of Kumar et al. and Pang et al. described above. Claims 4 and 5 are, therefore, patentable over Kumar et al., Pang et al., Skarbo et al., and Pepper et al. for at least the reasons given with respect to claim 1.

Independent claim 17 recites a combination of features of a method for mapping a single incoming call addressed to a particular dialed number to plural terminals via an H.323-based communication system. The method includes receiving the incoming call; translating the

incoming call into an H.323-compatible signal; accessing a configuration database to identify the terminals corresponding to the dialed number; and transmitting line appearance signals that identify an origin of the incoming call to each of the identified terminals.

Neither Kumar et al., Skarbo et al., nor Pepper et al., whether taken alone or in any reasonable combination, discloses or suggests these features. For example, none of the references discloses or suggests translating an incoming call into an H.323-compatible signal, accessing a configuration database to identify the terminals corresponding to the dialed telephone number, or transmitting line appearance signals to each of the identified terminals. The Examiner did not address any of these features and, therefore, failed to establish a *prima facie* case under 35 U.S.C. § 103.

For at least these reasons, claim 17 is patentable over Kumar et al., Skarbo et al., and Pepper et al., whether taken alone or in any reasonable combination. If the rejection is maintained, Applicants respectfully request that the Examiner specifically address these features. Claim 18 depends from claim 17 and, therefore, is patentable over the cited references for at least the reasons given with regard to claim 17.

Independent claim 19 recites a combination of features of a method for establishing an attendant/attendee relationship between plural terminal end-points via an H.323-based communication system. The method includes creating a configuration database storing attendant and attendee relationships between respective ones of the terminal end-points; receiving an incoming call addressed to a particular number; accessing the configuration database to determine if the number corresponds to an attendant or attendee terminal end-point; if the number corresponds to an attendant terminal end-point, transmitting a line appearance that

identifies an origin of the incoming call to the attendant terminal end-point; and if the number corresponds to an attendee terminal end-point, transmitting line appearances that identify the origin of the incoming call to the attendee terminal end-point and to the attendant terminal end-point associated in the configuration database with the attendee.

Neither Kumar et al., Skarbo et al., nor Pepper et al., whether taken alone or in any reasonable combination, discloses or suggests these features. For example, the references are silent with regard to an attendant/attendee relationship, where if a number corresponds to an attendant terminal end-point, a line appearance that identifies an origin of the incoming call is transmitted to the attendant terminal end-point, and if the number corresponds to an attendee terminal end-point, line appearances that identify the origin of the incoming call are transmitted to the attendee terminal end-point and to the attendant terminal end-point associated in a configuration database with the attendee. In the Office Action, the Examiner did not address these particular features.

For at least these reasons, Applicants respectfully submit that independent claim 19 is patentable over Kumar et al., Skarbo et al., and Pepper et al., whether taken alone or in any reasonable combination. If the rejection is maintained, Applicants respectfully request that the Examiner specifically address these features.

In view of the foregoing remarks, Applicants respectfully request reconsideration of this application and allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

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including extension of time fees, to Deposit Account No. 07-2339 and please credit any excess fees to such deposit account.

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